

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MIKAYLA CHEYENNE SAVAGE,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No.: 4:24-cv-00666
	§	
HARRIS COUNTY, TEXAS; SHERIFF ED	§	
GONZALES, in his official capacity;	§	
DETENTION OFFICER ARNOLDO	§	
MARTINEZ, in his individual capacity;	§	
DETENTION OFFICER ANDREW RADA,	§	
in his individual capacity; DETENTION	§	
ADMINISTRATIVE OPERATIONS	§	
OFFICER DANIKA MATHEWS, in her	§	
individual capacity; DETENTION OFFICER	§	
OZALYNN LOZANO, in his individual	§	
capacity; DETENTION OFFICER	§	
TRUCCELL LAGARDE, in her individual	§	
capacity; DETENTION OFFICER TAYLOR	§	
HODGES, in his individual capacity;	§	
DETENTION OFFICER GLORIA	§	
EZEOKI, in her individual capacity; LAW	§	
ENFORCEMENT OFFICER MICHAEL	§	
THOMAS, in his individual capacity; LAW	§	
ENFORCEMENT OFFICER LAKISHA	§	
CHEATHAM, in her individual capacity;	§	
and DETENTION OFFICER MARILYN	§	
JOHN, her individual capacity	§	
individual capacities.	§	
Defendants.	§	

PLAINTIFF MIKAYLA SAVAGE’S RESPONSES AND OBJECTIONS TO
DEFENDANTS ARNOLDO MARTINEZ AND ANDREW RADA’S
REQUESTS FOR ADMISSION

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiff Mikayla Savage hereby responds and objects to Defendants Arnolndo Martinez and Andrew Rada’s First Requests for Admission as follows:

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit Defendant Rada did not use any physical force against Plaintiff on or about June 6 or 7, 2022.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 2: Admit Plaintiff cannot positively identify Defendant Martinez as a person who used force against her on or about June 6 or 7, 2022 and July 13, 2022.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 3: Admit Defendants involvement, if any, in the alleged incidents making the basis of Plaintiff's claims, resulted in the use of reasonable and necessary force to detain Plaintiff.

RESPONSE: DENIED. Plaintiff further objects that the term "incidents" is vague and unclear.

REQUEST FOR ADMISSION NO. 4: Admit Plaintiff did not inform Defendants that she was pregnant prior to the alleged incident that occurred on or about June 6 or 7, 2022.

RESPONSE: DENIED. Plaintiff further objects that the term "incident" is vague and unclear.

REQUEST FOR ADMISSION NO. 5: Admit that on or around June 6 or 7, 2022, Defendant Rada did not grab or yank Plaintiff.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 6: Admit that on or around June 6 or 7, 2022, Plaintiff disregarded Defendant Rada and Defendant Martinez's instructions to comply with their lawful orders to line up in the hallway.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 7: Admit that on or around June 6 or 7, 2022, Defendant Rada did not strike Plaintiff with his hands or throw Plaintiff up against the wall.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 8: Admit that on or around June 6 or 7, 2022, Defendant Martinez did not strike Plaintiff with his hands.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 9: Admit, that on or about June 26 or 27, 2022, Mikayla Savage did not see Defendant Rada or Defendant Martinez witnessing her being assaulted by other inmates.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 10: Admit that on or about June 26 or 27, 2022, Mikayla Savage did not request Defendant Rada or Defendant Martinez to escort her to the medical unit to receive medical care.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 11: Admit that Plaintiff did not inform Defendant Rada that she was pregnant prior to the alleged incident that occurred on or about June 6 or 7, 2022.

RESPONSE: DENIED. Plaintiff further objects that the term “incident” is vague and unclear.

REQUEST FOR ADMISSION NO. 12: Admit that Plaintiff did not file a grievance with Harris County Sheriff’s Department regarding Defendant Rada and/or Defendant Martinez using excessive force and/or failing to intervene to stop an inmate assault on her.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 13: Admit Plaintiff’s injuries were caused by her resisting the Defendants’ commands to comply.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 14: Admit Plaintiff did not need medical attention for alleged injuries that occurred during the alleged incident on or about June 6 or 7, 2022.

RESPONSE: DENIED. Plaintiff further objects that the term “incident” is vague and unclear.

REQUEST FOR ADMISSION NO. 15: Admit Plaintiff did not seek medical attention for the alleged injuries that occurred at the time of either alleged incident complained of in Plaintiff's complaint.

RESPONSE: DENIED. Plaintiff further objects that the term "incident" is vague and unclear.

REQUEST FOR ADMISSION NO. 16: Admit Plaintiff's alleged injuries for the alleged incident of June 6 or 7, 2022 were not caused by Defendant Martinez.

RESPONSE: DENIED. Plaintiff further objects that the term "incident" is vague and unclear.

REQUEST FOR ADMISSION NO. 17: Admit Plaintiff has a long history of mental health issues which includes schizophrenia, bipolar disorder, and post traumatic stress disorder.

RESPONSE: Plaintiff objects that the term "long history" is vague. Plaintiff further objects to the extent that this Request requires her to offer a medical opinion for which she has no expertise concerning her mental health diagnoses or tenure of any putative mental health conditions. Plaintiff ADMITS that medical records obtained from the Harris County Jail include these conditions in their documentation, but it is not clear where this information came from or its veracity. Plaintiff lacks the specialized medical knowledge to further admit or deny this Request.

REQUEST FOR ADMISSION NO. 18: Admit Plaintiff was no more than 7 weeks pregnant at the time of the alleged incident that occurred on June 6 or June 7, 2022.

RESPONSE: DENIED. Plaintiff further objects that the term "incident" is vague and unclear.

REQUEST FOR ADMISSION NO. 19: Admit Plaintiff was not showing visible signs of pregnancy on June 6 or June 7, 2022.

RESPONSE: DENIED. Plaintiff further objects that the term "visible signs of pregnancy" is vague and unclear.

REQUEST FOR ADMISSION NO. 20: Admit Plaintiff had high risk medical conditions that caused complications during her pregnancy while in the Harris County Jail on June 6, 2022.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 21: Admit Plaintiff suffered no severe bodily injuries.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 22: Admit Plaintiff has no evidence of Defendant Martinez having any knowledge of Plaintiff mother's complaints to Harris County Jail supervisors regarding Plaintiff.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 23: Admit Plaintiff was not diagnosed or informed by a medical provider that she suffered a miscarriage due to trauma to her abdomen.

RESPONSE: ADMITTED.

REQUEST FOR ADMISSION NO. 24: Admit Defendant Rada and Defendant Martinez acted under the reasonable belief that their actions were in the course and scope of their official capacity.

RESPONSE: DENIED.

REQUEST FOR ADMISSION NO. 25: Admit Defendant Rada and Defendant Martinez did not place Plaintiff in a cell covered in feces, vomit, blood stains, and vermin for several weeks during the summer of 2022.

RESPONSE: DENIED.

Dated: March 7, 2025

Respectfully submitted,

/s/ Karley Buckley
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Attorneys for Plaintiff Mikayla Cheyenne Savage

CERTIFICATE OF SERVICE

I certify that, on March 7, 2025, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this certificate is attached was served on Defendants' attorney of record via e-mail.

/s/ Karley Buckley
Karley Buckley